NON-NOTIFIER REQUEST FORM

TWC ID:		YES	мо	
EPA ID:		YES	мо	
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	TRANSPORTER=X ISW	MSW WDW NO	N-HANDLER	·
STATE STATUS DESC	: S= Solid Waste Ge	enerator Only	7	
	P= Handler Status	Not Yet De	ined	
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Peggy Newserm DATE: 9-23-94 REQUESTED BY:

B. J. Wynne, III, Chairman John E. Birdwell, Commissioner Cliff Johnson, Commissioner



John J. Vay, General Counsel Michael E. Field, Chief Hearings Examiner Brenda W. Foster, Chief Clerk

Allen Beinke, Executive Director

March 8, 1990

Mr. Gary Mehring Freeman Resin Corporation Route 6, Box 615 Marshall, Texas 75670



Registration No. 32035, EPA ID No. 32000 Notice of Solid Waste Violations

Dear Mr. Mehring:

On 02/22/90, Tim Venneman of the Texas Water Commission (TWC) District 5 office conducted an inspection of the above-referenced facility to determine compliance with the commission's rules pertaining to solid waste management. During the inspection, conditions were observed and documented that we believe constitute noncompliance with the solid waste rules. The following areas of alleged noncompliance were observed:

1. 31 TAC 335.6(c) - Notification following changes to your solid waste notice registration should be made:

The facility needs to add the wastewaters generated from the rinsing of empty containers. The facility needs to change their NOR to reflect: waste codes 003 and 005 should reflect off-site disposition only, waste code 007 should reflect onsite/off-site disposition, waste code 008 should be listed under waste code 009, and waste code 010 should reflect offsite/sold for recovery.

Other changes that need to be made are as follows: waste code 009 should be added to the waste management facility 01, waste management facility 02 should reflect the storage of the wastewater generated from container rinsing, and waste code 003 should be eliminated from waste management facility 02.

31 TAC 335.9 - Recordkeeping The facility needs to document generation (volumes and any other pertinent records) for all wastes being generated at the Marshall plant.

Freeman Resin Corporation March 8, 1990 Page 2

Concerning these alleged noncompliances, we request your response in writing with a schedule for corrective action by April 7, 1990. In any case, compliance is to be achieved by May 6, 1990. We also request that you advise us of any corrective actions you may have taken.

An on-site inspection or review of records will be conducted at the appropriate time to verify compliance. Failure to respond within the requested time frame and to adequately remedy solid waste noncompliances may result in the initiation of formal enforcement action which could lead to administrative penalties of up to \$10,000 per day assessed against the company by the TWC.

If you have any questions, please contact Tim Venneman or Thomas Weber at 214/595-5466.

Sincerely,

John W. Witherspoon

John W. Witherspoon District 5 Manager

TEV/clm

cc: Cheryl Wilson, Information and Technical Services, Hazardous and Solid Waste Division



MON-9:81 1.55 = WELLE BY

Freeman Chemical Corporation P. O. Box 247 Port Washington, Wis. 53074



EPA Region VI 1201 Elm Street First International Building Dallas, TX 75270

ATTN: Mr. Fred Woods 6AEP



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

1201 ELM STREET

DALLAS, TEXAS 75270 February 18, 1982

TXD000719955
Freeman Resins
Attn: Lee Barwick
Rt 6 Box 294C
Marshall, Texas 75670

The RCRA permit application submitted on the above facility was returned to you a few weeks ago with a request for clarification of information, and to date we have received no response. In order to continue the processing of your application, we must receive the following information:

Facility Owner Information (Form 3 page 4 of 5)

To prevent further delay in processing, please provide this information to us within ten days of the date of this letter. Return the information to:

EPA - 6EP RCRA Activities 1201 Elm Street Dallas, Texas 75270

Should you have questions, please contact Mr. Dwight Corley at (214) 767-2765, or the above address.

Thanks very much for your cooperation.

Sincerely,

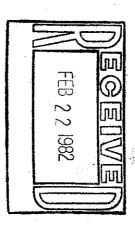
Gerald Fontenot, Chief Enforcement Section

cc: File/Referenced Facility

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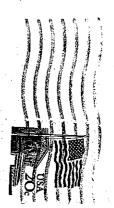
FREEMAN RESINS Rt. 6, Box 615 MARSHALL, TEXAS 75670



EPA-6EP RCRA Activities 1201 Elm St.

Dallas, Tex. 75270





Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

GENERATOR'S NAME:

Freeman Resin

Date rec'd:	Rec'd by:
XV. GENERATOR'S	EPA I.D. NO.
TIXIDIOIOIO'7	199551 11

XVI. WASTE MINIMIZATION (narrative description)

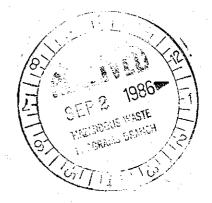
Freeman Resins Corp. currently is generating three hazardous waste streams, off-grade liquid polyester resin, spent xylene, and process reaction water. All three streams are hazardous due to flammability not toxicity.

All off-grade resins generated in 1985 were blended into usable "Odd-lot" resins and sold, effectively eliminating this waste stream. This work-off program has been used since 1980.

Reduction of the spent xylene and process reaction water streams is difficult in that they are directly proportional to production volume. Freeman has developed process procedures and equipment to minimize xylene usage. Process reaction water is a by product of a chemical reaction and can not be reduced without reducing production levels.

Sincerely,
Gary Mehring
Plant Manager
Freeman Resins Corp.
Marshall, Tex. 75670

Jean end here



John St.

TEXAS DEPARTMENT OF WATER RESOURCES.

1700 N. Congress Avenue Austin, Texas 2/24/84

TEXAS WATER DEVELOPMENT BOARD

Louis A. Beecherl, Jr., Chairman George W. McCleskey, Vice Chairman Glen E. Roney W. O. Bankston Lonnie A. "Bo" Pilgrim Louie Welch



Charles E. Nemir Executive Director TEXAS WATER COMMISSION
Paul Hopkins, Chairman
Lee B. M. Biggart
Ralph Roming

January 31, 1984

Mr. Russell L. Cerk, Vice President Freeman Resins Corporation 222 E. Main Street Port Washington, Wisconsin 53074

Dear Mr. Cerk:

Re: Freeman Resins Corporation, Marshall Site, Application No. 20331. Registration No. 32035

We have reviewed Part A - Facility Background Information for the above referenced site and also the Affidavit of Exclusion which was recently submitted for the purpose of withdrawing the hazardous waste permit application from further consideration in accordance with the exclusion claimed.

Based on our review of Part A and the Affidavit of Exclusion. the application for a hazardous waste permit has been withdrawn. We are retaining certain portions of the Part A for incorporation into your solid waste registration file.

If I may be of further assistance, please do not hesitate to contact me.

Very truly yours,

Charles Eanes
Permit Control & Reports

cc: WQ District 5 Office EPA - TXD00719955

TXD000719955

Del

TSD FA



P O Row 11097 Camies

TEXAS DEPARTMENT OF WATER RESOURCES

1700 N. Congress Avenue Austin, Texas

TEXAS WATER DEVELOPMENT BOARD

Louis A. Beecherl, Jr., Chairman George W. McCleskey, Vice Chairman Glen E. Roney W. O. Bankston Lonnic A. "Bo" Pilgrim Louie Welch



Charles E. Nemir Executive Director TEXAS WATER COMMISSION
Paul Hopkins, Chairman
Lee B. M. Biggart
Ralph Roming

January 31, 1984

Mr. Russell L. Cerk. Vice President Freeman Resins Corporation 222 E. Main Street Port Washington, Wisconsin 53074

Dear Mr. Cerk:

Re: Freeman Resins Corporation, Marshall Site, Application No. 20331. Registration No. 32035

We have reviewed Part A - Facility Background Information for the above referenced site and also the Affidavit of Exclusion which was recently submitted for the purpose of withdrawing the hazardous waste permit application from further consideration in accordance with the exclusion claimed.

Based on our review of Part A and the Affidavit of Exclusion, the application for a hazardous waste permit has been withdrawn. We are retaining certain portions of the Part A for incorporation into your solid waste registration file.

If I may be of further assistance, please do not hesitate to contact me .

Very truly yours,

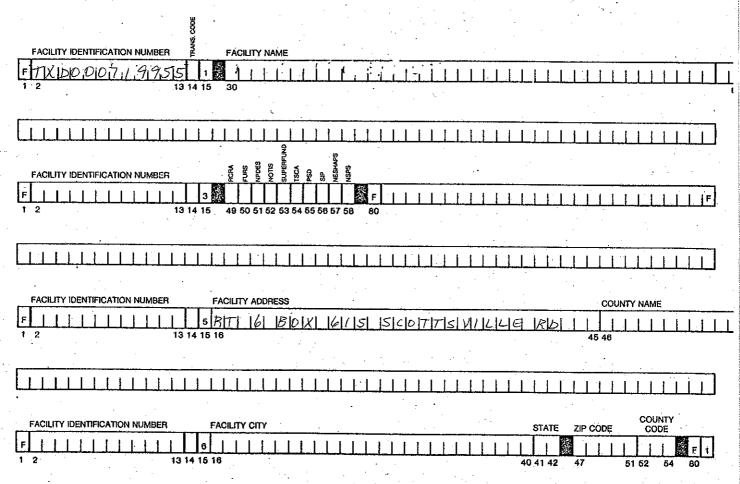
Charles Eanes
Permit Control & Reports

cc: WQ District 5 Office EPA - TXD00719955 TXD 00071 9955 The



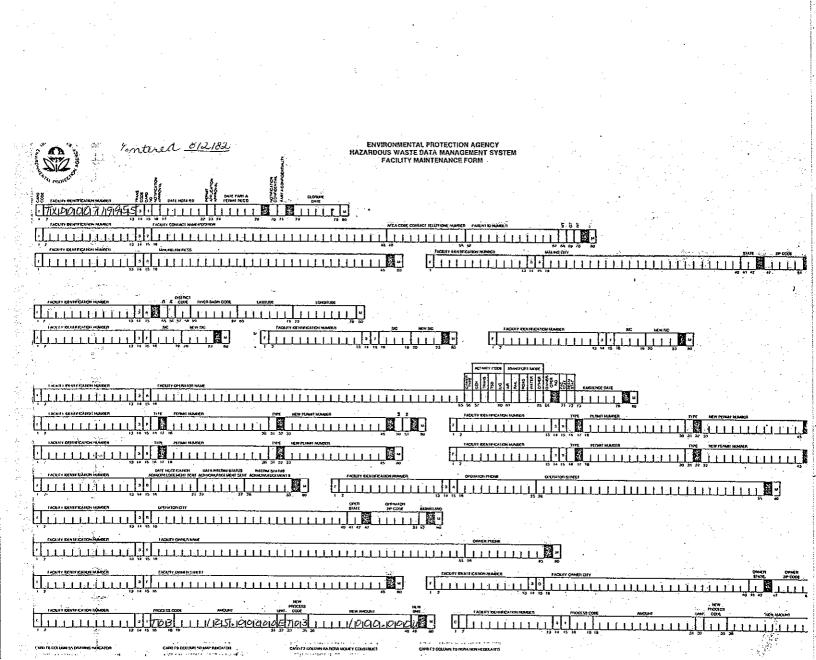


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December 16, 1981

Mr. Fred Woods EPA Region VI 1201 Elm Street First International Building Dallas, Texas 75270

Dear Mr. Woods:

The subject of this letter is the removal of our Marshall, Texas plant from interim status. In a previous letter (attached) I determined that DOO2 (original application incorrectly read D003) was not a hazardous waste.

We have discontinued the use of U002. F003, D001 and U239 are now saleable <u>finished products</u> and are not treated as waste. U147 and U190 are insignificant and would classify our company as small generators.

Please remove us from interim status or hazardous waste classification.

Sincerely,

FREEMAN CHEMICAL CORPORATION

Russell L. Cerk

Vice President Manufacturing

RLC/ss

Attachment

ate it where mater handled

PROCESSIO & FIRM 1-6-82

EPA ID No. TXD000719955



November 4, 1981

SEE PAGE 2

Re: Exemption of D002-T03 From The Hazardous Waste Classification

When I first listed our water of esterification as "hazardous" it was our opinion at the time that it could be corrosive not by pH, but by the second criteria that it could dissolve a steel pipe in a year's time.

We realized that the NACE test was not as good as a one-year test program. The reason for this one-year test is that the pH varies from 2.3 - 3.9.

Our tests are complete and the pipe remained intact. Along with this we had an outside laboratory run the standard TM-01-69 specified in NACE (see attached report). As you can see, the corrosion rate is less than .2 mmpy - a long way from 6.35 mmpy which is the upper limit for the test.

Our water of esterification is not a formulated product, but a byproduct waste or manufacturing process waste. It is not a commercial chemical product or manufacturing chemical intermediate. As
in Section 261.33-Federal Register Vol. 45 No. 98, it states that
"It does not refer to a material such as a manufacturing process
waste that contains any of the substances listed in paragraphs (e)
and (f)".

I then looked through 261.31 and 261.32, non-specific and specific sources, and found no waste number for water of esterification. I then looked at 261, subpart C, and filed for interim status assuming that it could be corrosive. Since the material is ninety-nine percent water it is not ignitable. It is not reactive or toxic.

Exemption of D002-T03 From The Hazardous Waste Classification November 4, 1981 Page 2

Now that our tests are complete, we have proved it is not corrosive; hence, it is not a hazardous waste.

Please remove this item from my hazardous waste permit, and send me some notification that you have removed this listing.

Yours truly,

FREEMAN CHEMICAL CORPORATION

Russell L. Cerk

Vice President Manufacturing

1-414-284-5541

RLC/ss

Letter sent to:

Ms. Shirley Bulkin EPA Region III P. O. Box 1480 Philadelphia, PA 19107 EPA I.D. No. VAD055046049

Mr. Y. J. Kim
EPA Region V
RCRA Activities
P. O. Box 7861
Chicago, IL 60680
EPA I.D. No. WID006091771

Mr. Fred Woods
EPA Region VI
Attn: 6AEP
1201 Elm Street
First International Bldg.
Dallas, TX 75270
EPA I.D. No. TXD000719955

Mr. Dennis Degner EPA Region VII P. O. Box 15606 Kansas City, MO 64106 EPA I.D. NO. IADO93108637 Pa

O

Note: Mr. Degner: In looking at our form I noted that line 10 reads "D003". This is an (ror; it should read "D002 I have enclosed a corrected sheet.



P.O. Box 686 Caton Farm Road Joliet, Illinois 60434

Telephone 815 727-5436 312 454-0245 Telex 723421 UAR JOL

Date Received October 2, 1981		Attn: Mr.	D. Gorjestani	
Completed October 26, 1981	٠.	Company	FREEMAN CHEMICAL	COMPANY
P.O. Number 33191		Address	222 East Main Str	eet
		City, State	,Zip Port Washingt	on, WI 53074

ArRo No.	Sample Description	Date	Delivered by	Temp	pН
67091E	Waste Water	10/1			
					
				1	
				 	

REVISED REPORT

	RCRA Act	Test	ted in Tripli	cate
	Corrosiviness Test		.0078 mm	
	Steel Discs SAE 1 55°C for 200 hour		.0091 mm	
	55 C 101 200 nour		.0084 mm	PY
REFERENCE:	Standard TM-01-69	"Test Methods for	the Evaluati	on of Solid Waste.
	Physical/Chemical M	lethods."		
				法产品申请 机工厂 医电子管
	I certify the	at I am familiar with the informati		
	report and	that to the best of my knowledge w	nd britef such infor-	ast Boketa
	mation is t	rue, complete, and accurate.	•	A.G. Roketa, Manager
Ammuoread his	(1) en la			Environmental Division
Approved by		- Comment		
	TERESE M. LACIA		November 4,	1981
	Latoratory Manage	r Date	November 4,	1 301
	the control of the co			



Freeman Chemical Corporation P. O. Box 247 Port Washington, Wis. 53074



Mr. Fred Woods
EPA Region VI
1201 Elm Street
First International Building
Dallas, TX 75270



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI 1201 ELM STREET DALLAS, TEXAS 75270 April 9, 1981

•TXD000719955
Freeman Resins Corp
Lee Barwick Plant Mgr
Rt 6 Box 294C
Marshall, Tx 75670

Scottsville Road Marshall Tx

Dear Sir:

The Environmental Protection Agency (EPA) has received your filing of the Part A Permit Application, as required by the Resource Conservation and Recovery Act (RCRA). Review of the application reveals that some of the information provided is either incomplete or illegible in those sections of the filing indicated:

Facility Name Form 1, Item III Facility Location Form 1, Item VI Form 1, Item V Facility Mailing Address Operator Information Form 1, Item VIII Form 1, Item XIII Certification Form 3, Item IX and/or X Process Information Form 3, Item III Waste Information Form 3, Item IV Owner Information Form 3, Item VIII Maps **Photographs** Drawings Latitude and Longitude

Please complete the items marked, then return the forms to:

Mr. Dwight Corley EPA - 6AEP 1201 Elm Street Dallas, TX 75270

Should you have any questions, please contact Mr. Corley at 214/767-2765.

Sincerely,

Fred B. Woods, Chief

Administrative Branch 6AEP

Fred B. Woods

cc: Respondent file



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

1201 ELM STREET

DALLAS, TEXAS 75270 February 18, 1982

TXD000719955
Freeman Resins
Attn: Lee Barwick
Rt 6 Box 2940
Marshall, Texas 75670

The RCRA permit application submitted on the above facility was returned to you a few weeks ago with a request for clarification of information, and to date we have received no response. In order to continue the processing of your application, we must receive the following information:

Facility Owner Information (Form 3 page 4 of 5)

To prevent further delay in processing, please provide this information to us within ten days of the date of this letter. Return the information to:

EPA - 6EP RCRA Activities 1201 Elm Street Dallas, Texas 75270

Should you have questions, please contact Mr. Dwight Corley at (214) 767-2765, or the above address.

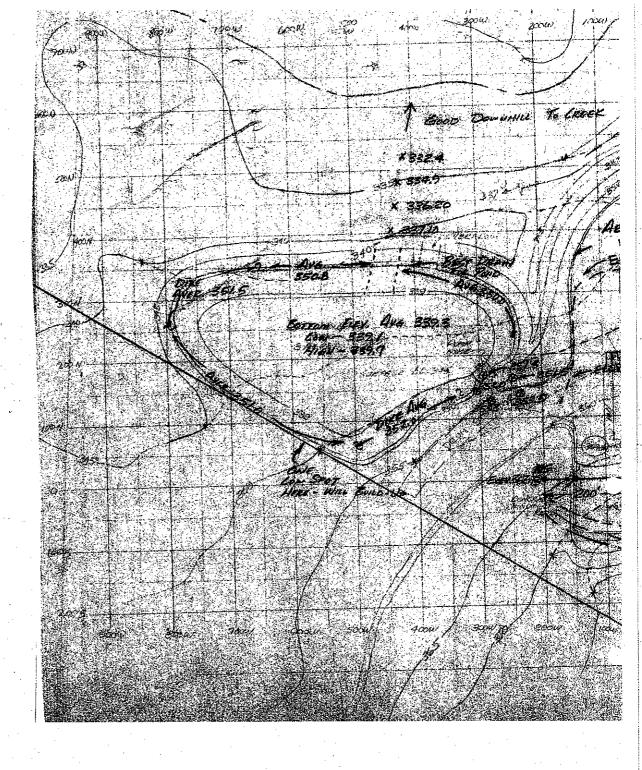
Thanks very much for your cooperation.

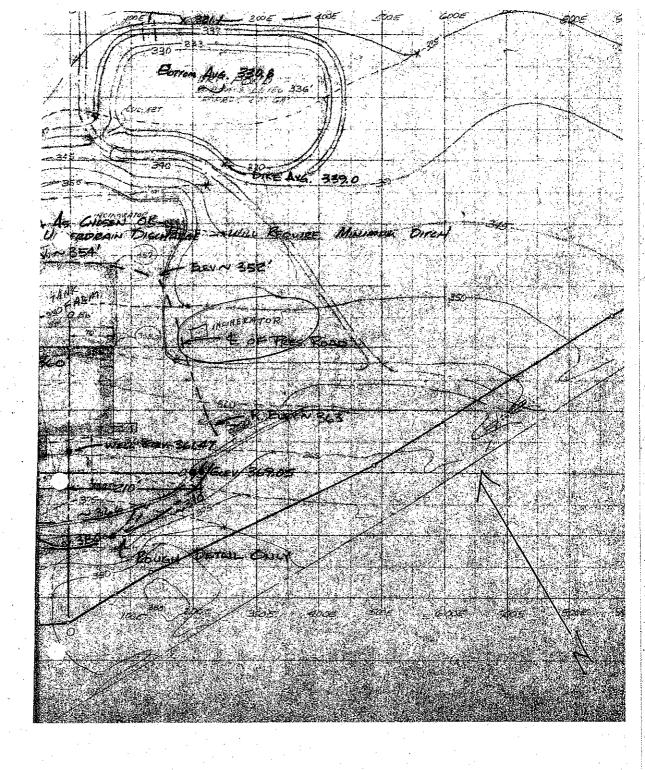
Sincerely,

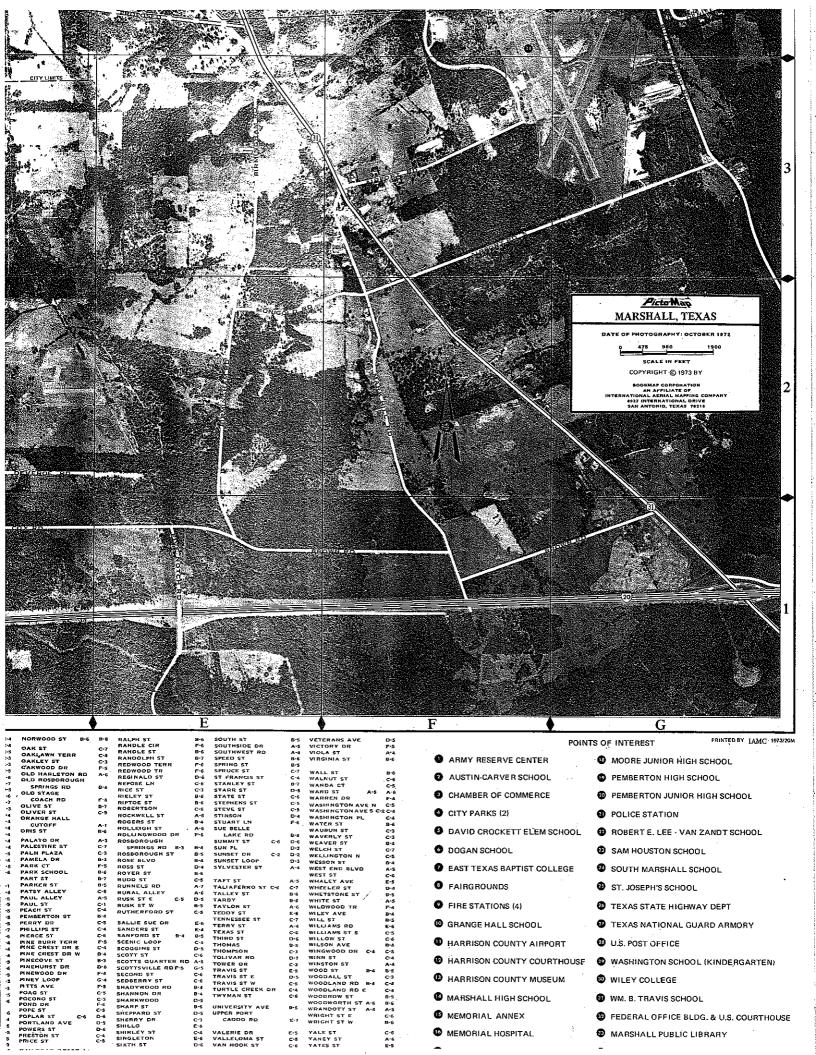
Gerald Fontenot, Chief Enforcement Section

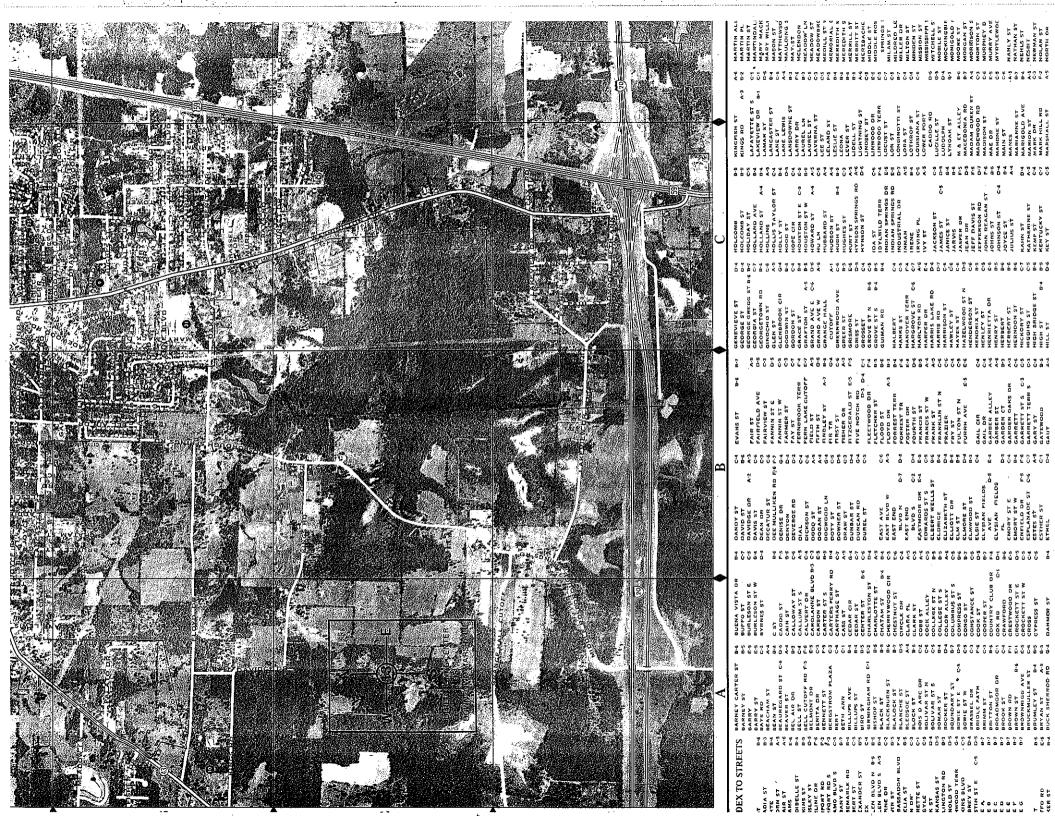
cc: File/Referenced Facility

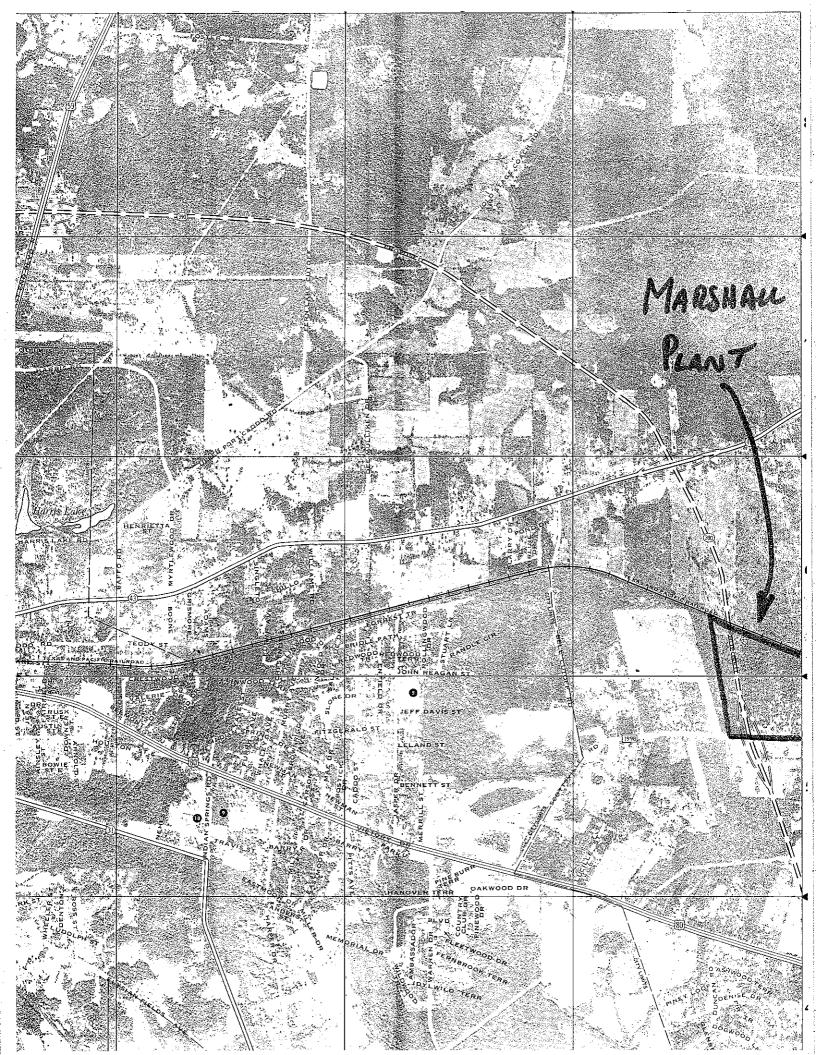


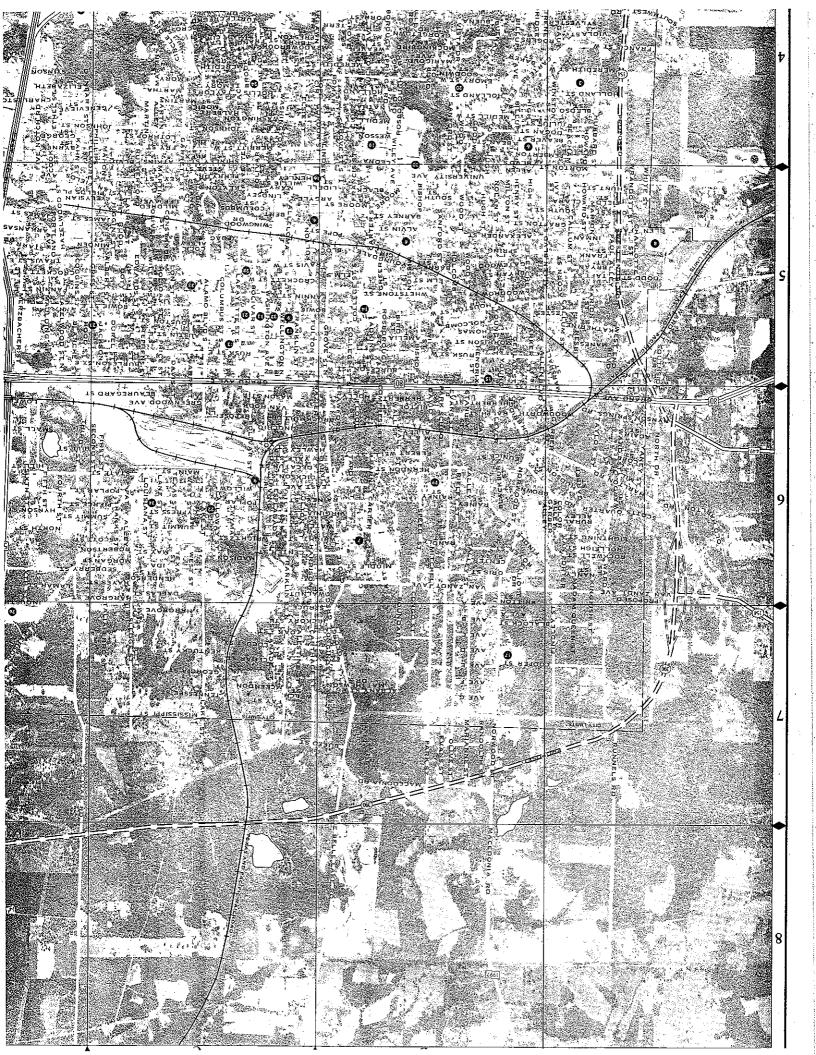




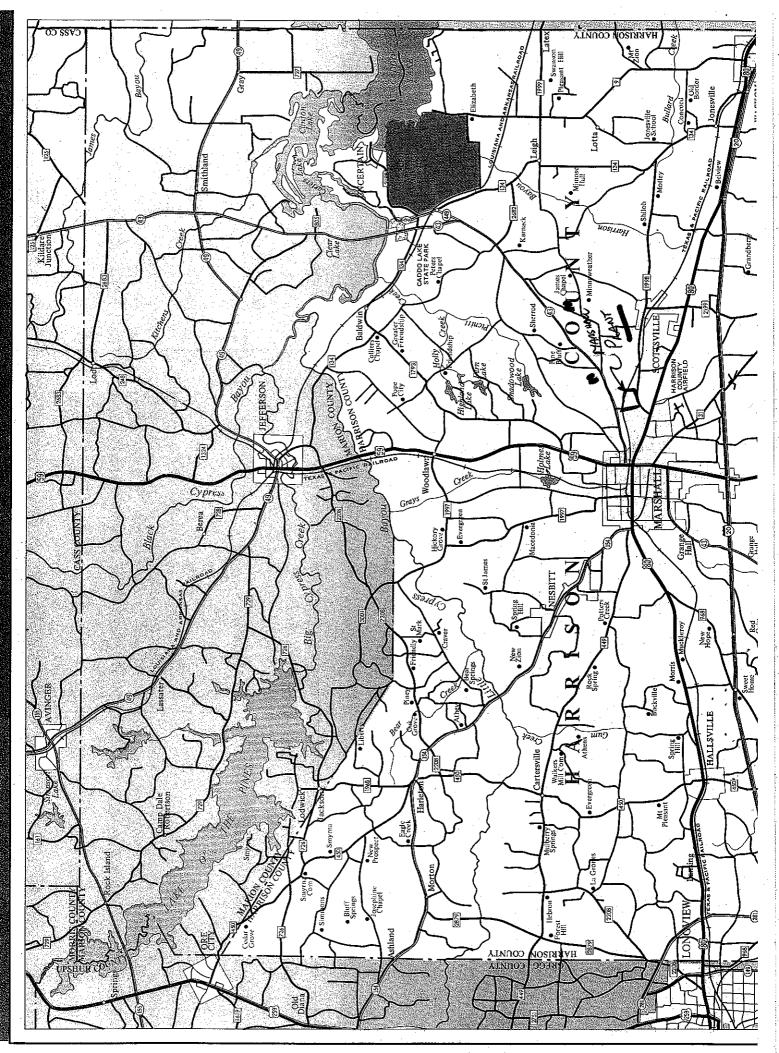


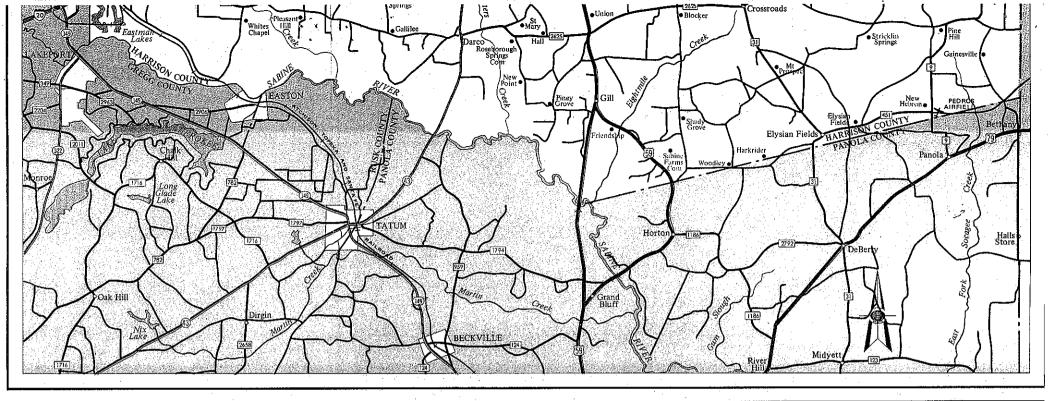


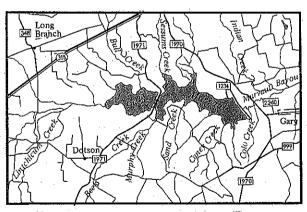


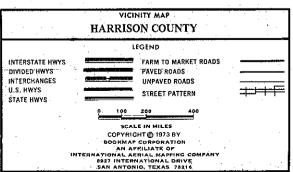


AREA RECREATION MAP GTEATTE WARSIAL









LIST OF MAP SPONSORS

First Federal Savings & Loan Association P.O. Box 1408 Marshall, Texas 75670

> First National Bank P.O. Box 1028 Marshall, Texas 75670

> The Gables Restaurant 304 E. Pinecrest Drive Marshall, Texas 75670

Duncan Real Estate 404 N. Washington Marshall, Texas Marshall Chamber of Commerce 301 E. Austin Marshall, Texas 75670

Marshall National Bank
. Box 968
Marshall, Texas 75670

National Car Rental Licensee 312 E. Houston Street Marshall, Texas 75670

Radio Marshall KMHT-1450 Leadership Radio For Marshall Marshall, Texas

About Marshall

Marshall, the county seat of Harrison County, is located in the hub of U.S. Highways 80 and 59, and Interstate 20. Ready access to important market areas is provided by the Texas & Pacific Mainline to New Orleans and to Dallas and El Paso, and the Missouri Pacific Mainline to Memphis and St. Louis and to Houston and San Antonio.

Harrison County, 1970 census 44,841, with a land area of 894 square miles, is located in the center of the fastest growing region in the United States. The economy is industrially and agriculturally based. An abundance of natural resources, an excellent transportation system and a huge labor force have combined to bring the county new and expanded manufacturing plants, while continuing to be one of the outstanding agricultural centers in the eastern portion of Texas.

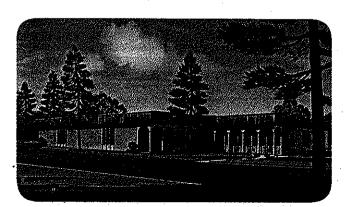
Built on seven hills like Rome, the city of Marshall covers an area of 11.67 square miles. Standing 411 feet above sea level, it has a pleasant annual mean temperature of 66.1 degrees. The summers lack humidity, and the winter days are sun-warmed with relatively few cold spells.

Marshall has been the focal point in development of Harrison County from a rural prairie to the 29th most populous county in Texas. Oil, lumbering, manufacturing, tourism, varied agribusiness and commerce have played and are still playing dominant roles in the area's growth. Its resources, such as timber, natural gas, clay, oil, coal and lignite are substantial.

The city is served by three banks and two savings and loan associations with resources of over \$115 million. There is one hospital with 146 beds and 4 nursing homes, and a \$4 million expansion is underway. The motels and hotels have a total of 350 rooms. Marshall has 40 churches representing all major denominations. The town also has a newly organized and functioning public library.

The Marshall News Messenger here is one of East Texas' leading daily newspapers with a circulation of 12,000. The Marshall trade area is served by two radio services of the Radio Marshall, Inc. They are Radio Marshall, KMHT, and Radio KHER-FM, the only FM station in this trade area. Marshall is also served by KDOX Radio, a daytime station. In addition, Marshall receives three television stations with Class A signals.

Public education is a major interest in Marshall. The school system has two new junior high schools and 2 remodeled and modernized high schools, 10 elementary schools with a faculty





of over 400. Marshall is also the home of two accredited fouryear colleges. Wiley College, which has been located in Marshall for 100 years, has an enrollment of approximately 700 students. East Texas Baptist College has been established in Marshall for over 50 years and also has an enrollment of approximately 700 students.

Opportunities for both indoor and outdoor recreation abound in the Marshall area. Found here is a modern bowling alley, indoor and drive-in movie theaters and three youth baseball stadiums and one of professional dimensions.

Marshall has three country clubs with sporty golf courses, swimming pools and new clubhouses. Marshall is located within a 15 to 90 minute drive to over a dozen lakes from downtown Marshall - - - Lake O' the Pines, Caddo Lake, Murval, Toledo Bend, Sam Rayburn and many more.

The Community Concert Association Music Club, Symphony Society, Garden Club and Art Club are prominent and active. Civic and fraternal organizations include Rotary, Kiwanis, Lions, Optimists, Jaycees, Elks, Altrusa, American Legion and others.



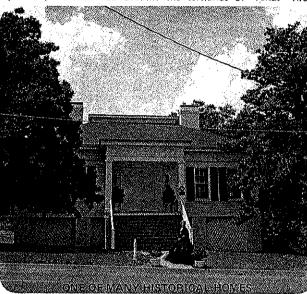
Harrison County, of which Marshall is the county seat, attracted its earliest settlers in the 1830's. It was organized by the Republic of Texas in 1839 from lands originally assigned to Shelby County. Removed from the long-established "Camino Real" running from Natchitoches, La., to San Antonio, and buffered by sprawling Caddo Lake and its Caddo tribesmen, the area was slower to be settled than others in the eastern portion. One of the earliest settlements was Elysian Fields, in southeastern Harrison County. It was here that Isaac Van Zandt; later to become one of Texas' giants, settled in 1839 before moving to Marshall three years later. Another early settlement was Port Caddo, in the northeastern part of the county, where a ferry assisted immigrants from the northeast and where its location on Big Cypress Bayou promised river transportation.

The original townsite of Marshall (an eight-block square in the center of the city) was selected in 1841 as the third seat of government and occupies land donated by Peter Whetstone, one of the five commissioners. Named for John Marshall, the city was incorporated by the Republic on December 31, 1844.

The illiterate Whetstone, as an encouragement to the choice of townsite, also donated land for "Marshall University," which was chartered as a school for boys in 1842.

Harrison was the most populous county in Texas by 1850, with 11,822 residents, and Marshall was the seventh largest city. Stage lines connected it with all the population centers, and freight lines with river ports at Port Caddo and Jefferson. In that year, Marshall Lodge No. 22, A.F. & A.M., established Masonic Female Institute for girls. The Texas Republican already was building the reputation which would make it one of Texas' leading newspapers for the next 20 years. The Marshall bar numbered some of the most illustrious attorneys in the state.

By 1860, Marshall had become the terminus of Texas' firs'



interstate telegraph line, add the city was acknowledged the leader in political opinion and governmental affairs. J. Pinckney Henderson, Texas' first governor, was elected to the U.S. Senate while living here. Louis T. Wigfall, who would be come a Confederate general commanding Hood's Texas Brigade and a Confederate senator, also was elected U.S. senator while living here. Marshall's Edward Clark became the first Confederate governor of Texas when Sam Houston refused to declare his allegiance to the new government. Pendleton Murrah, a Marshall attorney, was the last Confederate governor. James Harper Starr was Confederate postmaster-general for the Trans Mississippi Department, headquartered at the Holcomb plan tation home. Marshall was home of the Missouri government in exile the last two years of the war, and was the site of a number of important military installations.

Soil and water conservation practices have improved the agricultural picture in recent times. Great forward strides have been made toward the conscious conservation of wildlife - - - a great attraction to both Indians and pioneer white men in the early days.

Modern-day leaders of the county seek to preserve the good things of earlier days and to add improvements in the breadth of new knowledge. By conservation and wise use, the county, with its abundant resources, can shape its future



SPORTSMAN'S PLAYGROUND . . . tennis courts, golf courses, weekly auto races. Only minutes away from downtown Marshall are over a dozen area lakes - Caddo Lake, Lake O' the Pines, Toledo Bend, Murval and more for fishing, hunting, camping and water sports. Enjoy numerous hiking, biking and trail rides, or take a ride on the sternwheeler, Caddo Queen.

HISTORY BUFF'S DELIGHT . . . called the "Athens of Texas" in 1850. Take a drive around or a surrey ride to see more than 50 century old homes and buildings in Harrison County, (24 ante-bellum). See the Harrison County Historic Museum and four other museums, the restored Ginocchio Hotel, and historic cemeteries. See the Confederate Powder Mill site via horseback. Ride down General's Row. See Sam Houston's Campaign Oak and the largest Black Oak in Texas, 130 years old.

PHOTOGRAPHER'S DREAM . . . Marshall is picturesquely located between seven rolling timbered hills ablaze with year round color. Near the Sabine stands the State's Champion Black Tupelo Tree (second largest in USA), and the county is laced with romantic springs and trails; the Stagecoach Road, Trammel's Trace, Cherokee and Comanche Traces.

Easily accessible, Marshall is a hub of transportation. Interstate 20, Highways 59, 43 and 80 all come into her city limits.





"Duncan Sells Marshall"

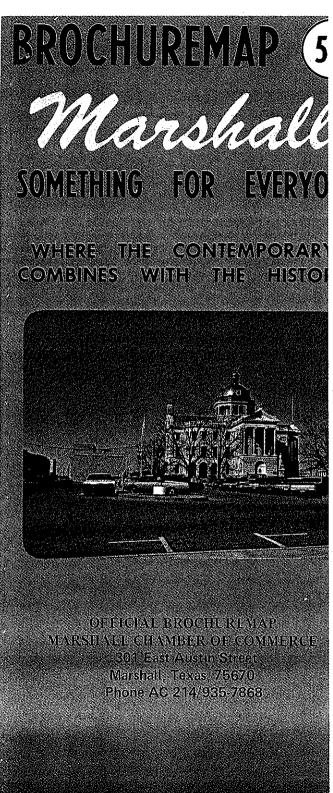
REALTORS DEVELOPERS
BUILDERS

DUNCAN Real Estate

404 N. WASHINGTON 938-6342-935-2733



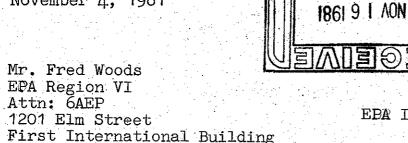




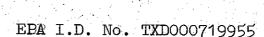


1

November 4, 1981



75270



Dear Mr. Woods:

Dallas, TX

Re: Exemption of D002-T03 From The Hazardous Waste Classification

When I first listed our water of esterification as "hazardous" it was our opinion at the time that it could be corrosive not by pH, but by the second criteria that it could dissolve a steel pipe in a year's time.

We realized that the NACE test was not as good as a one-year test program. The reason for this one-year test is that the pH varies from 2.3 - 3.9.

Our tests are complete and the pipe remained intact. Along with this we had an outside laboratory run the standard TM-01-69 specified in NACE. (See attached report) As you can see, the corrosion rate is less than .2 mmpy - a long way from 6.35 mmpy which is the upper limit for the test.

Our water of esterification is not a formulated product, but a byproduct waste or manufacturing process waste. It is not a commercial chemical product or manufacturing chemical intermediate. As
in Section 261.33-Federal Register Vol. 45 No. 98, it states that
"It does not refer to a material such as a manufacturing process
waste that contains any of the substances listed in paragraphs (e)
and (f)".

I then looked through 261.31 and 261:32, non-specific and specific sources, and found no waste number for water of esterification. I then looked at 261, subpart C, and filed for interim status assuming that it could be corrosive. Since the material is ninety-nine percent water it is not ignitable. It is not reactive or toxic.

Exemption of DOO2-TO3 From The Hazardous Waste Classification November 4, 1981 Page 2

Now that our tests are complete, we have proved it is not corrosive; hence, it is not a hazardous waste.

Please remove this item from my hazardous waste permit, and send me some notification that you have removed this listing.

Yours truly,

FREEMAN CHEMICAL CORPORATION

Russell L. Cerk

Vice President Manufacturing

1-414-284-5541

RLC/ss



P.O. Box 686 Caton Farm Road Joliet, Illinois 60434

Telephone 815 727-5436 312 454-0245 Telex 723421 UAR JOL

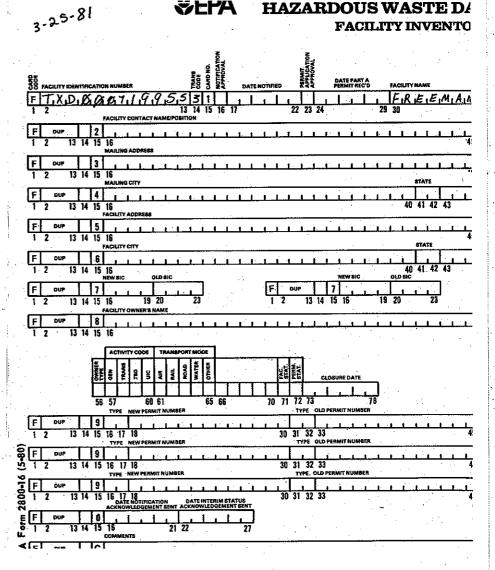
Date Received October 2, 1981	Attn: Mr. D. Gorjestani
Completed October 26, 1981	Company FREEMAN CHEMICAL COMPANY
P.O. Number 33191	Address 222 East Main Street
	City, State, Zip Port Washington, WI 53074

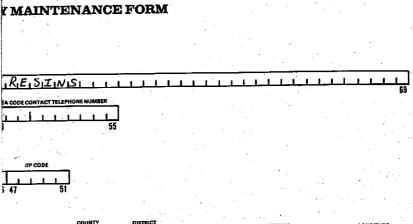
ArRo No.	Sample Description	Date	Delivered by	Temp	pН
67091E	Waste Water	10/1			F
			2	· ·	
		1			
				†	
					

REVISED REPORT

	NEVISED REPURI
ANALYSIS	
	RCRA Act Corrosiviness Test Steel Discs SAE 1020 @ .0091 mmpy 55°C for 200 hours .0084 mmpy
REFERENCE:	Standard TM-01-69 "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods."
	$oldsymbol{1}_{ij}$
Approved by	1 certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate. A.G. Roketa, Manager Environmental Division
-PP-0 vod by	TERESE M. LACIAK
	Latoratory Manager Date November 4, 1981

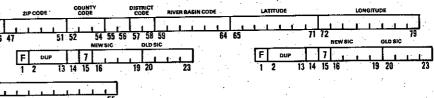
FIX HAZARDOUS WASTE DA **FACILITY INVENTO**

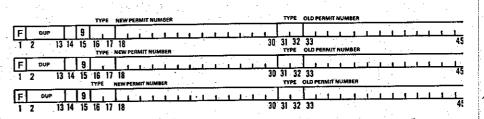




A MANAGEMENT SYSTEM

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Part A, Permit Process --- Internal Checklist

ID Number	X DOOD 719955 Inst Name FREMAN	Resins	
Refer to	PHASE ONE	Indicate by	Valid
Form No:	Interim Regulatory Requirements	your initials: Yes No	Prmlg Date?
1	T/S/D'Facility? (If No, return to respondent.)	MM	السند
3	Form 1 received?	MM	
	Form 3 received?	MM	ora es es e cons
1 & 3	Postmarked on or before November 19, 1980?	MM	
3	Date of operation entered?	MM	· · · · · · · · · · · · · · · · · · ·
3	Date of operation on or before November 19, 1980?	MM	
Notif.	Notifier?	MM	//
record	Notified on or before August 18, 1980?	MM	
1 1	Form 1, XIII B signed?	MM	
3	Form 3, IX B Signed?	MM	
(If all ter Acknowledge	n items above are initialed in the Yes column, general and indicate the trigger date here:	ate Interim Statu	S
	PHASE TWO		
1	Unsure if regulated or non-regulated?	GT	
3	New facility?	<u></u>	
1 & 3	Core items missing? If Yes, indicate which items:		
	Facility name; location; mail address; ope	erator info;	
	<pre>certification; process info; waste info; c</pre>	owner X ; sigs	•
	PHASE THREE		
1 & 3	Non-core items missing? If Yes, indicate which ite	ems:	
	Maps; photos; drawings; lat/long		····
	Other observations and comments:		
		Received Date St	- qus
Log out/Log	in	80/11/13	i.

(Stamo forms also)

on reverse side.

OUT

BAUME	DENTIFICATION OF RECORD R, TITLE AND/OR SUBJECT, DATE OF FILE OR DOCUMENT)	CHARGED TO (PERSON & OFFICE)	DATE CHARGED OUT
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Same in the second seco			
OPTIONAL FORM 23			
FEB 1962 GSA Grouler No. 259	CHARGEOU 5023	T RECORD *** **	
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DATE CHARGED TUO	CHARGED TO	IDENTIFICATION OF RECORD LE AND/OR SULLECT, DATE OF FILE OR DOCUMENT!	THUMBER TH

7567

CONTINUED FROM THE FRONT		
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289 (specify)	(S) (S) (O) (S) (S) (S) (S) (S) (S) (S) (S) (S) (S	D FOURTH
WINGERRATOR INFORMATION	Sto of Section	871stbename listedin Jaeniyiti Aysigothe
LEE BARWICK		owner?
SESTATE OF CREATER FOR MEMORY DRUG SESTATE OF COUNTRY (PROPERTY)	etter into the answer box at# 9ther+specify) state (specify)	214939957/
RT6 BOX 294C		
MARSHALL	TX 756	20 IX INDIAN LAND
ZE EXISTING/ENVIRONMENT/AUPERMITS	este (chie Emissions nom Proposed Sources)	
TXOO72818 DE	SE OUDER (Specify)	
Grid Signatura (Signatura (Signat	C4892 AIR	(specify) State Form PI-3
2	02073 WATER	(specify) State Endorsnent.
Attach to this application a topographic map of the the outline of the facility, the location of leach of the facility of the location of leach of the treatment, storage con disposal facilities, and leaches	its existing and proposed intake and disc	harde structures leach of its hazardous waste a 🦠
Water bodies in the map area. See instructions for pr	ediscrequirements	# # # # # # # # # # # # # # # # # # #
we process f	poly esters to	a dus Try
		ra: 1
		F4. 7/51
XIII ESBECE CATION fee instructions) > It certify inderspenalty of law that i have personal feature ments and that, frased on my inquity of it is application to believe that dieantormalian is true.	nose persons immediately responsible to	r obtaining the information contained in the
Alise information, including the possibility of time at	nd imprisonment. B. SIGNATURE	C. DATE SIGNED
RUSSEM Cente ME	Wyt. (full	11-4-0
C Comments to the comment of the com		$\frac{1}{1-2} \frac{1}{1-2} \frac{1}$

Continued from the front,

III. PROCESSES (continued)

A STATE OF THE PARTY OF THE PAR

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

S-01 We are storing our ash in drums panding a pennit application to bury our plant site.

IV DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Support D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed wastels) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B.C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds Der year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes ave corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Lat			EP.		, *		C. UNIT	D. PROCESSES	
20	W	٩S	ΤE	D. NO de)	B. ESTIMATEI QUANTITY C		OF MEA- SURE (enter code)	1. PROCESS CODES 2. PROC (enter) (if a code i	ESS DESCRIPTION s not entered in D(1))
	Á	1	5	4	900)	P	0 3 D 8 0	
X-2	L	10	0	2	400)	P	03D80	
X-3	D	10	0	I	100)	P	0 3 D 8 0	
X-4	Ī	1	ļ		٠			includ	ed with above

Continued from page 2.

90 NOTE: Photocopy this page before completing if you have more than 26 wastes to list. Form Approved OMB No. 158-S80004 EPA I.D. NUMBER (enter from page 1) FOR OFFICIAL USE ONLY 3 DUP DUP DESCRIPTION OF HAZARDOUS WASTES (continued) C.UNIT OFMEA-SURE (enter A. EPA HAZARD. WASTE NO D. PROCESSES B. ESTIMATED ANNUAL QUANTITY OF WASTE 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) 1. PROCESS CODES (enter) (enter code) code - 29 27 34 P 100,000,000 1 P 2 UO 000.000 0 500.000 3 500,000 0 4 250,000,000 D 5 6 100,000,000 7 900,000,000 water of esterificati 8 9 F003+U239 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26

EPA Form 3510-3 (6-80)

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W. DESCRIPTION OF HAZARDOUS WAST	ontinued)	
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V. FACILITY DRAWING		
All existing facilities must include in the space provided on VI. PHOTOGRAPHS	page bia scale drawing of the facility (ise instruction	ns for more detail). F(6: 155
All existing facilities must include photographs (aer	ial or ground—level) that clearly delineate all	existing structures; existing storage, Ak
treatment and disposal areas; and sites of future sto	rage, treatment or disposal areas (see Instruction	ons for more detail). I-(g. 150)
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VIII FACILITY OWNER		
A. If the facility owner is also the facility operator as skip to Section IX below.	listed in Section VIII on Form 1, "General Informat	ion", place an "X" in the box to the left and
B. If the facility owner is not the facility operator as	listed in Section VIII on Form 1, complete the follo	wing items:
1. NAME OF FACI	LITY'S LEGAL OWNER	22PHONE NO. (area code & no.)
H.H. KobenTson Co	2 •	4/1/2/-28/1/-3/2/0 0
3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST. 6. ZIP CODE
Fluo Coateway Center	G Pitts burgh	PA 15222
IX. OWNER CERTIFICATION		
I certify under penalty of law that I have personally documents, and that based on my inquiry of those i	examined and am familiar with the informati ndividuals immediately responsible for obtain	on submitted in this and all attached ing the information, I believe that the
submitted information is true, accurate, and comple including the possibility of fine and imprisonment.		
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Russell Cerk	(Yearle Che	11-5-0
X, OPERATOR CERTIFICATION		
I certify under penalty of law that I have personally documents, and that based on my inquiry of those i submitted information is true, accurate, and comple	ndividuals immediately responsible for obtain	ing the information, I believe that the
including the possibility of fine and imprisonment.	to, r.am aware that there are significant pendi	and for submitting raise information,
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Lee Bannich	Jee Borens	2 /1-4-80
PA Form 3510-3 (6-80)	PAGE 4 OF 5	CONTINUE ON PAGE 5

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REQUESTED SMALL GEN EXCL IN LTR of 12/16/81. SEE MAINT. FORM OF 1/4/82.